

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Liling Guan, individually and on behalf of all other employees similarly situated,

Plaintiffs,

vs.

Lash Princess 56 Inc. d/b/a Lash Princess 56 d/b/a Lash Princess, Oscar Lin, and Qinyu Liu a/k/a Ula Liu,

Defendants.

Civil Action No.: 1:22-cv-02552-KPF

**NOTICE OF CROSS-MOTION FOR
LEAVE TO FILE AMENDED
COMPLAINT AND IN
OPPOSITION TO DEFENDANTS'
12(B)(6) MOTION TO DISMISS**

Please take notice that the Plaintiff, Liling Guan, by and through undersigned counsel, upon the declaration of Ziyi Gao, the papers attached hereto, the accompanying memorandum of law, and upon all prior proceedings had herein, cross-moves to amend her pleadings to add Defendants Lash Princess 57 Inc. d/b/a Lash Moment Studio d/b/a Lash Princess, to further plea additional facts to support Plaintiff's allegations that Lash Moment Studio is substantial continuity of Corporate Defendant Lash Princess 56 Inc. d/b/a Lash Princess 56 d/b/a Lash Princess, and in opposition to the Defendants' Fed R. Civ. P. 12(b)(6) Motion to Dismiss made by Lash Princess 56 Inc. d/b/a Lash Princess 56 d/b/a Lash Princess, Oscar Lin, and Qinyu Liu a/k/a Ula Liu (collectively, the "Defendants").

Dated: September 12, 2022
Flushing, New York

/s/ Ziyi Gao

Ziyi Gao, Esq.

Attorney for Plaintiff

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